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**VIA ECFS  
VIA E-MAIL**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-A325  
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation, ET Docket No. 13-49

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. § 1.1206, the Association of Global Automakers, Inc. ("Global Automakers"), by its attorneys, hereby submits this letter summarizing an *ex parte* meeting in the above-referenced docket.

On October 25, 2018, Global Automakers' Steve Gehring, Vice President, Vehicle Safety and Connected Automation, Hannah Izon, Senior Manager, Federal Government Affairs, and Paul Scullion, Senior Manager, Vehicle Safety and Connected Automation, along with counsel Scott Delacourt of Wiley Rein LLP, met with Nicholas Degani, Senior Counsel, Office of Chairman Ajit Pai, and Will Adams, Legal Advisor, Office of Commissioner Brendan Carr. The attached handouts were distributed during the meetings.

The parties discussed how vehicle-to-everything (V2X) services are already being deployed by major auto manufacturers and twenty-six states, as well as the status of European standard setting for V2X services. The parties also discussed how V2X will deliver significant safety benefits now, while autonomous vehicles (AVs) are in their infancy and, in the future, as part of a mixed fleet of traditional vehicles and AVs. Lastly, the parties discussed how V2X will be integral as part of a connected transportation network that leverages 5G and other communications technologies to lay the foundation for higher levels of vehicle automation.

For these reasons, consistent with the statements of the National Highway Transportation Safety Administration and the joint statement of entities representing



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the entire auto industry, Global Automakers urged the Commission to retain the entire 5.9 GHz allocation – all seven channels – for V2X auto safety services.

Please direct any questions to the undersigned.

Respectfully,

*/s/ Scott Delacourt*

Scott D. Delacourt

*Counsel to Global Automakers*

Attachments

cc (via email): Nicholas Degani

Will Adams

Steve Gehring

Hannah Izon

Paul Scullion

October 24, 2018 **PRESS RELEASE**



## Multi-stakeholder Statement on Preserving 5.9 GHz

***The Association of Global Automakers, The Alliance of Automobile Manufacturers, 5G Automotive Association, Intelligent Transportation Society of America, and the American Association of State Highway and Transportation Officials issued the following statement in response to the recent filing by NCTA-The Internet & Television Association suggesting that spectrum reserved for transportation safety services should be repurposed:***

The Association of Global Automakers, The Alliance of Automobile Manufacturers, The Intelligent Transportation Society of America, The 5G Automotive Association and The American Association of State Highway and Transportation Officials strongly support preserving the full 5.9 GHz band for transportation safety use, as it has been allocated.

Our members are actively developing technologies, and own and operate critical highway and other transportation infrastructure that connects vehicles to vehicles, to other road users, and to their environment to help reduce crashes. Connected vehicle and infrastructure technology includes vehicle communication with bicyclists, pedestrians, traffic lights, and advanced alerts of hazards like ice on roadways, commonly known as vehicle-to-everything (V2X). Additionally, they can enhance automated driving systems, which hold the promise to provide numerous economic, environmental, and societal benefits, such as decreased congestion and fuel consumption, and increased access for the elderly and disabled.

The entire 5.9 GHz band is needed to achieve the full benefit of these communication technologies in the years to come. These safety innovations require dedicated spectrum to ensure they work right every time without signal interference. Millions of dollars have already been invested in this effort, including incorporating connected vehicle technologies into infrastructure.

We are on the cusp of a major breakthrough in vehicle connectivity and safety innovations. With significant past and present investments in connected vehicle innovations, V2X technologies are already being deployed for the purposes of improving road safety. This will only continue moving forward. With 37,133 deaths on U.S. roadways last year alone, we must take every opportunity to save the lives of road users. Connected vehicle technologies offer the U.S. a powerful set of tools to save lives, but only if these technologies are given the ability to progress. We support protecting the entire 5.9 GHz band for transportation safety applications. Any unlicensed use in the band should be done without harmful interference to the incumbent technology or other intelligent transportation systems technologies.

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# U.S. Department of Transportation's National Highway Traffic Safety Administration issues statement on safety value of 5.9 GHz spectrum

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"Preserving the 5.9 GHz band for transportation communications is essential to public safety today and in the future. The automotive industry and municipalities are already deploying V2X technology and actively utilizing all seven channels of the 5.9 GHz band. There are more than 70 active deployments of V2X communications with thousands of vehicles already on the road. This technology has the potential to improve infrastructure, safety and efficiency as the Department works to make road travel and future transportation significantly safer.

As noted in the Department's recent AV 3.0 guidance, the three-phase research plan currently underway was developed collaboratively with the Federal Communications Commission (FCC) and the U.S. Department of Commerce to explore spectrum sharing technology that maintains priority use for vehicle communications. The three phases of the test plan are interdependent and ongoing, and the testing will show whether unlicensed devices can safely operate in the 5.9 GHz band. With lifesaving safety capabilities at stake, the Department maintains that all three phases of research must be completed before any decisions about spectrum reallocation can be made.

10/29/2018

U.S. Department of Transportation's National Highway Traffic Safety Administration issues statement on safety value of 5.9 GHz spectrum | NHTSA

The U.S. DOT will continue to work closely with the FCC and NTIA to utilize the 5.9 GHz band for public safety applications and vehicle safety communications."

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